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Before the Federal Communications Commission
Washington, DC 20554

In the matter of WT Docket 98-143

1998 Biennial Review
Amendment of Part 97
of the Commission's
Amateur Service rules

COMMENTS OF:

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I. INTRODUCTION

I, Anthony G. George, file these comments on November 20, 1998, in the Federal Communication Commission's Notice of Proposed Rulemaking, WT Docket Number 98-143.

As a citizen of the United States and holding Extra class license KØWQ in the Amateur Radio Service as issued by the Commission, I offer the following comments. Although written to express my beliefs, the intent is to be brief but complete. These comments are submitted due to my genuine interest in the Amateur Service, and my concern to maintain its integrity. It is evident that some changes are needed. I believe that all operators should have a high degree of discipline and prudence when considering the responsibility of their license.

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II. Number of Amateur Service License Classes

I believe the number of license classes should be reduced to four (Extra, Advanced, General and Technician). I also feel they should be named as such. The Technician Plus license class should be phased out.

III. Importance and Disposition of the Novice Class

The Novice class license should be phased out. As stated by the Commission, this class no longer serves a useful purpose. Current Novice class operators should be grandfathered, and be able to renew or upgrade.

Novice operators should be allowed operate Morse code anywhere within the 80, 40, 15 and 10 meter bands, and would be limited to 200 watts maximum power output at all times.

I am opposed to converting any existing designated Morse code frequencies to phone. The current band plans suffice both phone and code operations and should remain unchanged.

IV. Advanced Class VEs for the General Class

I believe Advanced class volunteer examiners should be allowed to prepare and administer tests for the General class. Likewise, General class VEs should be allowed to prepare and administer tests for the Technician class.

VI. Enforcement in the Amateur Radio Service (continued)

While some individuals are reluctant to pay for "expected" services, perhaps a 5 or ten dollar fee would be appropriate when applying for, upgrading or renewing an amateur license. These fees would provide additional funds for the Commission's enforcement program. I believe that most operators would be willing to enhance the Commission's enforcement capabilities. A lack of responsible enforcement will only allow this problem to increase.

VII. Telegraphy Examination Requirements

I believe the telegraphy requirement should remain, however I suggest two tests instead of three. The General class operator would be required to copy by ear at 10 words per minute and the Extra class at 18 words per minute. This would ease the difficulty of the 13 wpm test that often discourages many operators from seeking a General class license to gain HF privileges.

To compensate for the reduction of code copy for General class, I suggest additional elements be added to the General class written exam. Such elements would cover in greater detail proper on-the-air practices and FCC regulations.

The ability to answer by way of multiple choice on telegraphy exams should be abolished. Examinees should be able to choose between one minute of solid copy or fill-in-the-blank.

VII. Telegraphy Examination Requirements (continued)

The current waiver system for disabled examinees should be eliminated. The array of accommodations that VEs may choose from should suffice in most cases and should remain available. The VEs should not be burdened with the responsibility of judging whether or not a waiver should be granted. If a disabled examinee has failed the Extra class code test (18 wpm), a statement listing the particulars would be signed by the VE team and sent to the Commission for waiver consideration. The sole responsibility for a waiver to the 18 wpm code requirement should rest with the Commission.

I believe a waiver should not be granted for the General class (10 wpm) code requirement.

VIII. Written Examination Requirements

The current question pools appear to be basically adequate. The required number of questions for each topic also appears to be adequate. As I suggest in item VII, perhaps additional questions pertaining to operating regulations should be added to the General class exam. This is the first step to HF operations, and additional emphasis on techniques and regulations would be beneficial.

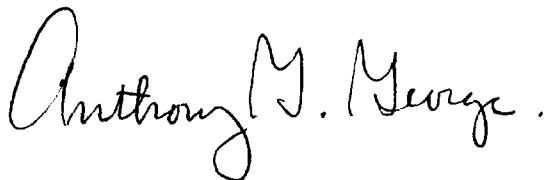
IX. Conclusions

I truly believe that somewhat strict disciplines need to be maintained in order to prevent the degradation of the Amateur Radio Service. A severe lessening of these disciplines may lead to complete disregard of the operating behavior by many individuals. It is my hope that changes due to restructuring will result in an overall improvement in the quality of the Service and provide a more streamlined and efficient method for the Commission.

The Commission is to be commended for their concern to contemplate necessary changes and their consideration to seek the amateur's opinions.

Thank you for the opportunity to submit my feelings.

Respectfully submitted by:

A handwritten signature in cursive script that reads "Anthony G. George". The signature is written in dark ink and is positioned above the typed name and address.

Anthony G. George
302 Universal Drive
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November 20, 1998

V. Phasing out RACES Station Callsigns

As explained by the Commission, the issuance of RACES callsigns is not necessary. I agree that these should not be renewed and phased out.

VI. Enforcement in the Amateur Radio Service

It is fairly often that inappropriate behavior can be heard on the Amateur frequencies. While self-policing has a positive effect, it does not always suffice. Offensive language and unmodulated carriers with the intent to cause malicious interference can be heard on two bands in particular. Some operators believe that inappropriate and offensive language on the air must be tolerated due to their right to free speech. Unfortunately they do not realize that their operating license is a privilege and not a "right".

Due to budget constraints of the last several years, we have experienced a reduction in services from many governmental entities. However, I believe that most radio operators agree that additional enforcement is needed. If the private sector can not obtain the legal approvals for the necessary enforcement and punishment, the Commission should receive additional funding.